

BERGSTEIN & ULLRICH, LLP

- ATTORNEYS AT LAW -

15 RAILROAD AVENUE • CHESTER, NEW YORK 10918

TELEPHONE (845) 469-1277

FACSIMILE (845) 469-5904

E-MAIL: [thefirm@tbulaw.com](mailto:thefirm@tbulaw.com)

[www.tbulaw.com](http://www.tbulaw.com)

Stephen Bergstein  
Helen G. Ullrich

JAN 15 2008

*Of Counsel*  
Christophe D. Watkins

VIA FACSIMILE (914) 390-4152

January 15, 2008

**MEMO ENDORSE**

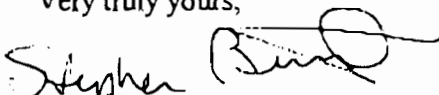
Hon. Kenneth M. Karas  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

Re: Baggatta v. Boyce Excavating  
07 Civ. 3544 (KMK)

Dear Judge Karas:

This firm represents plaintiff Steven Baggatta in the above-styled matter. Discovery is schedule 1 to end on February 1, 2008. The parties are in the process of taking depositions, which were delayed in part by plaintiff's illness earlier this month. The parties have also had scheduling conflicts which prevented us from completing depositions by the end of this month. We expect to take four additional depositions and expect to be able to complete discovery by March 3, 2008. Defendant's counsel consents to this request.

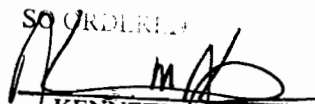
Very truly yours,

  
Stephen Bergstein

cc: Carol Pierce, Esq.

USDS SDNY DOCUMENT ELECTRONICALLY FILED DOC #: _____ DATE FILED: _____
--

Granted.

SO ORDERED  
  
KENNETH M. KARAS U.S.D.J.  
1/15/08